

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**TERRI PECHNER-JAMES and SONIA )  
FERNANDEZ, )  
Plaintiffs, )  
 )  
v. )  
 )  
CITY OF REVERE, THOMAS AMBROSINO, )  
MAYOR, CITY OF REVERE POLICE )  
DEPARTMENT, TERRENCE REARDON, )  
CHIEF OF POLICE, BERNARD FOSTER, )  
SALVATORE SANTORO, ROY COLANNINO,)  
FREDERICK ROLAND, THOMAS DOHERTY,)  
JOHN NELSON, JAMES RUSSO, MICHAEL )  
MURPHY and STEVEN FORD, )  
Defendants, )**

**C.A. No. 03-12499-MLW**

**DEFENDANT, CITY OF REVERE'S, CERTIFICATE  
OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

1. Motion for Leave to File a Memorandum in Excess of 20 Pages.

On June 13, 2005, Defendants' Counsel, Assistant City Solicitor Walter H. Porr, Jr., sent a letter to Plaintiffs' Counsel, James Dilday, regarding their intended motion for summary judgment. A true and accurate copy of said letter is attached to Defendants' motion as Exhibit "A". One of the purposes of this letter was to attempt to narrow or resolve sufficient issues such that the memorandum might not exceed the twenty page limitation. Since Plaintiffs' Counsel did not reply to this letter, this attempt has failed.

2. Motion for Relief From the Time Limit of F.R.C.P. 30(d)(2).

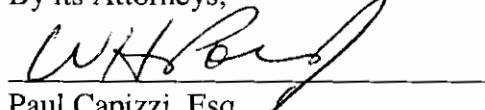
On June 15, 2005, Defendants' Counsel, Assistant City Solicitor Walter H. Porr, Jr., sent a letter to Plaintiffs' Counsel, James Dilday, regarding the issue of the length of his clients' depositions in light of the voluminous allegations they have made, the voluminous records which

have been generated both before and during the pendency of this case and the magnitude of their damage claims. A true and accurate copy of said letter is attached to Defendants' motion as Exhibit "A". The purpose of this letter was to attempt to reach an agreement with Plaintiffs' Counsel concerning the length of his clients' depositions. Since Plaintiffs' Counsel did not reply to this letter, this attempt has failed.

Having attempted to narrow and resolve the issues presented by the above-referenced motions without success, said Defendant now files said motions and this certificate of compliance pursuant to local rule 7.1(a)(2).

For the Defendant, **CITY OF REVERE**,

By its Attorneys,



Paul Capizzi, Esq.  
City Solicitor  
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pcapizzi@rvere.org  
Walter H. Porr, Jr., Esq.  
Assistant City Solicitor  
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781-286-8166

Dated: June 27, 2005.

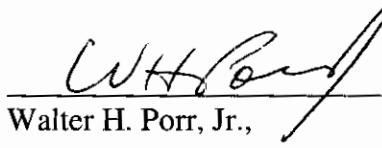
**CERTIFICATE OF SERVICE**

I, Walter H. Porr, Jr., Assistant City Solicitor and counsel of record for the Defendants, City of Revere, City of Revere Police Department, Mayor Thomas Ambrosino and Police Chief Terence Reardon, hereby certify that I have, this day forwarded a copy of the foregoing Certificate of Compliance, to all parties herein by mailing same, this date, via first class mail, postage prepaid to:

James S. Dilday, Esq.  
27 School Street, Suite 400  
Boston, MA 02108  
Attorney for the Plaintiffs

Michael J. Akerson, Esq.  
Reardon, Joyce and Akerson, P.C.  
397 Grove Street  
Worcester, MA 01605  
Attorneys for Defendants  
Bernard Foster, Salvatore Santoro,  
Roy Colannino, Frederick Roland,  
Thomas Doherty, John Nelson,  
James Russo, Michael Murphy,  
and Steven Ford

Dated: June 29, 2005

  
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Walter H. Porr, Jr.,